

**VANDERSLICE DECL.
EXHIBIT A2**

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 MAXIMILIAN KLEIN, et al., on behalf of
6 themselves and all others similarly situated,

7 Plaintiffs,

8 v.

9 META PLATFORMS, INC., a Delaware
Corporation,

10 Defendant.

Case No. 3:20-cv-08570-JD

**Declaration of Non-Party Netflix,
Inc. in Support of Motion to Seal**

11
12 I, Brett Celedonia, declare as follows:

13 1. I am Vice President and Associate General Counsel, Marketing,
14 Advertising, Comms and Consumer Products at Netflix, Inc. I submit this
15 declaration in support of the parties' Omnibus Sealing Motion filed in connection
16 with Defendant's Motion for Summary Judgment Re: Advertisers' Amended
17 Complaint filed in this matter.

18 2. Based on my work at Netflix, I have personal knowledge of the
19 company's practices and procedures for maintaining the confidentiality of its
20 strategic, business, and financial information, as well as the impact of publicly
21 disclosing such information.

22 3. The contents of this declaration are true and correct to the best of my
23 knowledge, information, and belief, and are based on Netflix's policies and
24 practices as they relate to the treatment of confidential information and the
25 materials that were provided to me and reviewed by me, and/or informed by
26 conversations with other knowledgeable employees of Netflix. If called upon as a
27 witness in this action, I could and would testify competently thereto.
28

4. I have reviewed redacted excerpts of a filing made by Meta Platforms, Inc. in this case which references Plaintiffs' interpretation of Netflix's advertising spend on Facebook in 2018.

5. Good cause exists to maintain the specific figure projected by Plaintiffs under seal. Netflix considers the specific figure of its annual advertising spend on Facebook to be confidential and, to my knowledge, this specific figure is not a matter of public record. Netflix's annual advertising spend on Facebook is determined internally at Netflix and therefore reveals confidential business strategy with respect to advertising.

6. Public disclosure of this specific figure could harm Netflix, who is not a party to this action. Disclosure of this specific figure could give Netflix's competitors insight into Netflix's confidential business strategy with respect to advertising.

7. Netflix therefore requests that the Court maintain under seal the following figures and quotations:

- Dkt. 874-1 (Defendant's Motion for Summary Judgment)
 - 17:20-21, specific quote and figure
 - 18:13-14, specific quote and figure
 - 18:25, specific figure

8. Netflix's request is narrowly tailored to only the specific figure related to Plaintiff's interpretation of Netflix's advertising spend on Facebook in 2018.

I declare that the foregoing is true and correct under penalty of perjury.

Signed in Los Angeles, California on March 7, 2025.

DocuSigned by:
 By: Brett Celedonia
 E391173CD9BE44F...
 Brett Celedonia March 7, 2025